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February 26, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 4G North
Brooklyn, New York 11201

Re: Roofers, Waterproofers & Allied Workers Local Union No. 8 Annuity Fund v. AWE Inc.
Case No.: 1:22-cv-7833 (AMD) (PK) (EDNY)

Dear Judge Kuo:

This firm represents Defendants AWE Incorporated and Isufi Kujtim in the above-captioned case. Defendants respectfully request a brief adjournment of the February 28, 2024 hearing concerning Defendants' motion to vacate the Clerk's Entry of Default.

The reason for this request is due to various scheduling conflicts and to allow the parties to continue to explore resolution of this matter. In fact, the parties' counsel has scheduled an in-person meeting at the office of Plaintiffs' counsel for February 29, 2024.

Plaintiffs' counsel, Sylvie Straus-Figueroa, consents to this request.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

By: /s Netanel Newberger, Esq.